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NOTES OF CASES.

Conflicting Jurisdiction.—An action for personal injuries caused by the collision of the vessels *Kaiser Wilhelm der Grosse* and the *Orinoco*, reported in 175 *Federal Reporter*, 215, under the title of the two vessels above named, involves a rather novel question of jurisdiction. The *Kaiser Wilhelm* is a German vessel; the *Orinoco* a British vessel; the libellant a resident of the United States, but a citizen of Austria. The collision occurred within a marine league of the French coast, and presumably within French water, if the same law relating to maritime jurisdiction is in force there as here. The action was brought in the District Court of the United States, which overruled all objections to jurisdiction and took cognizance of the case on its merits. In addition to the jurisdictional problem, an interesting question involved was the effect to be given to a decision of the English High Court of Justice, holding the *Kaiser Wilhelm* solely responsible for the collision. The American court held that while doubtless this decree would not affect the right of libellant to establish her claim against either vessel, yet, as between the vessels themselves, it should be held *res judicata*, and, as libellant was indifferent as to which one recovery should be against, the *Orinoco* would be excused in accordance with the ruling of the English court.

Right of Infant to Discharge in Bankruptcy.—Henry Walrath, an infant, filed a voluntary petition in bankruptcy. One Parsnow appeared as a creditor, and filed a claim, which was duly proved and allowed. There were no assets and no other claims. On the application of the bankrupt for a discharge, in *Re Walrath*, 175 *Federal Reporter*, 243, Parsnow objected on the ground that under the bankruptcy act no one was entitled to a discharge except one who "owes debts," and that, as an infant might repudiate his liabilities on becoming of age, it could not be said before that time that a debt was really "owed" by him. The court rejected this contention, however, by saying that the claim in this instance was on a judgment in an action for negligence and would constitute a debt, notwithstanding the infancy of the bankrupt; and that as Parsnow had filed his claim, and had it allowed as a debt in the bankruptcy proceeding, he could not now say that it was not a debt, and prevent a discharge.

Animal Feræ Nature—Raccoon—Liability of Owner for Damages Done by.—*Andrew v. Kilgour*. Metcalfe, J. A raccoon is an animal *feræ naturæ* and a person who keeps one in a town is liable in damages for any injury inflicted by it on a neighbour upon escaping from captivity although the animal has been kept in the defendant's house for a long time, and was supposed to have been tamed.

Hale's *Pleas of the Crown*, vol. 1, p. 430, and *Filburn v. People's Palace*, etc., L. R. 25 Q. B. D. 258, followed.—*Canada Law Journal*.